



August 5, 2004

Defense Acquisition Regulations Council
Attn: Ms. Amy Williams
OUSD(AT&L)DPAP(DAR)
IMD 3C132
3062 Defense Pentagon
Washington, DC 20301-3062

Subject: Interim Rule, "Written Assurance of Technical Data Conformity" 48 CFR Parts 227 and 252 (DFARS Case 2003-D104).

Dear Ms. Williams:

The Aerospace Industries Association (AIA) is pleased to have the opportunity to provide comments on the proposed rule to remove the clause at DFARS 252.227-7036, Declaration of Technical Data Conformity as stated in the Department's above referenced notice issued on June 20, 2004 (69 Fed.Reg. 31911-31912). The proposed rule would eliminate the requirement for contractors to furnish written assurance that the delivered technical data is complete and accurate and satisfies the requirements of the contract.

Our member companies support the efforts by the Department of Defense to improve the efficiency and effectiveness of the acquisition process (DFARS Transformation). By eliminating the certification, this will reduce the paperwork required for submission of contractual data to the USG by our member companies. Therefore we fully endorse the removal of the clause at DFARS 252.227-7036.

Thank you for the opportunity to provide our comments. If there are any questions concerning our comments on the proposed rule, please contact Kirsten Koepsel of AIA (703.358.1044). Her email address is koepsel@aia-aerospace.org.

Sincerely,

A handwritten signature in black ink, appearing to read 'Robert T. Marlow', is written over a horizontal line.

Robert T. Marlow
Vice President
Government Division